

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

THIS DOCUMENT RELATES TO:

## All Cases

MDL No. 2419  
Dkt. No 1:13-md-2419 (RWZ)

**SAINT THOMAS ENTITIES' MOTION FOR LEAVE  
TO FILE EXHIBIT UNDER SEAL**

The Saint Thomas Entities<sup>1</sup> move this Honorable Court, pursuant to Local Rule 7.2, to permit Exhibit B of the Saint Thomas Entities' Memorandum in Support of their Motion Compel the NECC Post-Confirmation Officer to Produce Certain Materials to be filed under seal. Exhibit B consists of excerpts of an index of documents preserved by the Post-Confirmation Officer. It has been designated as Confidential Discovery Material pursuant to this Court's Third Amended Protective Order (Dkt. No. 814). It should remain under seal until this MDL is terminated and should then be returned to local counsel for the Saint Thomas Entities.

WHEREFORE, the Saint Thomas Entities respectfully request that the Court permit the exhibit referenced above to be filed under seal.

<sup>1</sup> Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

Dated: October 29, 2015

SAINT THOMAS WEST HOSPITAL F/K/A  
ST. THOMAS HOSPITAL, SAINT THOMAS  
HEALTH, AND SAINT THOMAS  
NETWORK

By their attorneys,

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**CERTIFICATE OF SERVICE**

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 29th day of October, 2015.

/s/ Sarah Kelly

Sarah P. Kelly

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